

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

FRANCHISE GROUP, INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

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)  
) Chapter 11  
)  
) Case No. 24-12480 (LSS)  
)  
) (Jointly Administered)  
)  
) **Re: Docket No. \_\_**

**ORDER EXTENDING THE ADMINISTRATIVE CLAIMS OBJECTION  
DEADLINE UNDER CONFIRMED CHAPTER 11 PLANS**

Upon the motion (the “Motion”)<sup>2</sup> of the above-captioned reorganized debtor (the “Reorganized Debtor”) and Freedom VCM Holdings, LLC (“TopCo”) and, together with the Reorganized Debtor, the “Reorganized Debtors”) pursuant to section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9006 seeking entry of an order (this “Order”) extending the Administrative Expense Claims Objection Deadline under the Plan; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and this Court having reviewed the Motion, and any responses thereto; and upon the record of the

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<sup>1</sup> The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. For purposes of this Order, the term “Reorganized Debtors” also includes certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors’ cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

chapter 11 cases; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The Administrative Expense Claims Objection Deadline is hereby extended by 120 days, through and including December 3, 2025 with respect to the OpCo Debtors, and through and including December 30, 2025 with respect to TopCo, without prejudice to the Reorganized Debtors' right to seek further extensions thereof.
3. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.